

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

YAKOV COHEN a/k/a "Jay Collins" a/k/a "Kobi Cohen," YOSEF HERZOG a/k/a "Yossi Herzog," ORI MAYMON a/k/a "Or Maymon" a/k/a "Patrick Accardo," NISSIM ALFASI a/k/a "Nick Onasis," ELAD BIGELMAN a/k/a "Michael Goldberg," RUNAL JEEBUN a/k/a "Ryan Jeebun," SABRINA ELOFER a/k/a "Mila Morales," AFIK TORI a/k/a "Kevin White" a/k/a "Harvey Stone," and ANOG MAAREK a/k/a "Daniel Buckley" a/k/a "Daniel Marek,"

Defendants.

Criminal Action No. PX-19-77

UNDER SEAL

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
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MOTION FOR LIMITED UNSEALING OF INDICTMENT

The United States of America, by and through its attorneys at the Fraud Section of the Criminal Division of the United States Department of Justice, moves for entry of an Order unsealing the Indictment for the limited purpose of permitting the government to disclose redacted Indictments and arrest warrants to government personnel, including personnel of a foreign government, as necessary to assist in the apprehension and extradition of the Defendants to the United States. In support of its motion, the Government states:

1. On or about February 13, 2019, a federal grand jury sitting in the District of Maryland returned a four-count Indictment charging all nine Defendants with conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349 (Count One), and wire fraud, in violation of Title 18, United States Code, 1343 and 2 (Counts Two, Three, and Four).
2. The Government believes that all of the Defendants are currently outside of the United States.

3. To safeguard one or more cooperating witnesses and to protect the Government's ongoing investigation, the Indictment in this case remains sealed.

4. The Government intends to seek extradition and/or attempt to apprehend the Defendants pursuant to Provisional Arrest Warrants.

5. Attached hereto as Exhibits 1 through 9 are proposed redacted Indictments corresponding to each of the nine Defendants.

6. If the Court grants this Motion, the Government would disclose the respective redacted Indictments to government personnel, including personnel of a foreign government, as needed in order to apprehend and extradite the Defendants. For example, Exhibit 1 would be used for the purposes of apprehending and extraditing Yakov Cohen a/k/a "Jay Collins" a/k/a "Kobi Cohen."

7. In order to attempt the apprehension and extradition of the Defendants, the Government respectfully requests entry of the attached proposed Order.

Respectfully submitted,

ROBERT A. ZINK
Acting Chief, Fraud Section
Criminal Division
U.S. Department of Justice

By: /s/
Ankush Khardori, Trial Attorney
Tracee Plowell, Assistant Chief

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